

Code of Conduct for Dynea AS

1. GENERAL

- a. Our ethical guidelines set the standard for what we consider to be responsible conduct in relations with our cooperating partners and internally within the company.
- b. Dynea AS shall be an ethically responsible company and shall carry out its business activities with integrity. We shall respect laws, international conventions, human rights and cultural diversity, as well as the standards that follow from sound business practices, regardless of where we carry out our business activities.
- c. The ethical guidelines do not stipulate how an employee shall act in every situation that may arise in the course of his/her work. The individual shall apply good judgement and if there is any doubt or a situation feels inappropriate or unfair, the matter must be taken up with an immediate superior.
- d. The ethical guidelines apply to all employees of Dynea – also to temporary staff and hired personnel that carry out work on behalf of Dynea. The Managing Director is responsible for ensuring that the ethical guidelines are drawn up, implemented and followed up. All managers have a responsibility to ensure that all employees make themselves familiar with the guidelines and for following up that they are upheld. All employees are obliged to study the guidelines and must at all times consider their conduct in relation to these regulations.
- e. This document is authorised by the Board of Directors of Dynea AS.

2. CONDUCT IN BUSINESS

- a. Dynea shall compete on an ethically justifiable basis and not bring about or contribute to any breach of competition rules or in any other manner act contrary to applicable competition legislation.
- b. At Dynea we shall avoid doing business with companies or persons that act in contravention of laws or internationally recognised ethical standards. We do not tolerate any form of corruption or bribery and we shall follow laws and international regulations aimed at combating money laundering and terrorism.
- c. Our employees and others that represent Dynea shall conduct themselves impartially in all business dealings. We shall not give business associates improper advantages. Individual employees shall avoid becoming involved in any situations that can be detrimental to Dynea's interests or in any other manner have a negative effect on Dynea's or the individual's ability to act in a free and independent manner.
- d. Employees must avoid being placed in situations in which questions may be asked regarding their personal interests. Employees shall not accept gifts or other benefits for themselves or close associates that are improper or that can compromise the recipient's and Dynea's integrity, or in any other way harm Dynea's interests or reputation. Any gifts that can be accepted must be of a low financial value.
- e. We shall practice openness when we are offered or receive gifts or other benefits. In such case an immediate superior must be informed.

- f. From our side, we shall not offer gifts or other improper benefits to any party in order to gain commercial advantages. Gifts and “give-aways” with a low financial value are acceptable.
- g. Participation at social arrangements etc. on invitation from external parties must be ethically defensible and must be authorised by a superior. The principal rule is that it is acceptable to participate at this type of arrangement if it has a professional or commercial relevance for Dynea. In general, Dynea shall pay travel and accommodation costs in such case.
- h. Normal representation in line with local, sound business practice is acceptable. This is on the premise that this type of representation is kept at a moderate level.
- i. Dynea may use sponsor funds to promote the company and its business. Any sponsorship shall support the company’s role as an engaged community party and contribute to strengthening the sense of attachment to the company among employees.
- j. Dynea does not support political parties or individual politicians. This does not preclude us from supporting political viewpoints that promote the company’s interests.

3. CONDUCT AT THE WORKPLACE

- a. Dynea shall run its business enterprises in line with basic human rights such as are laid down in the UN Declaration on Human Rights and adhere to ILO Conventions on the right to freedom of association, prohibition of child labour, prohibition of forced labour and discrimination. This means that we will place emphasis on the fair treatment of employees and that no-one shall be subjected to discrimination on the basis of gender, religion, race, skin colour, national or ethnic origin, political association, sexual orientation, age or marital status.
- b. We shall only apply relevant qualifications such as education, experience, achieved results and other professional criteria as a basis when hiring, promoting, training or evaluating remuneration. Our aim is to have a diverse organisation based on the principle of equal opportunities for all.
- c. Employees shall contribute to ensuring that we have a sound working environment, characterised by equality, openness and tolerance. We will not accept any form of harassment, discrimination or inappropriate conduct in relation to colleagues or others interacted with as a Dynea employee.
- d. Health, safety and the environment (HSE) is an important part of Dynea’s daily activities. We shall continually improve so that our activities and products place as little strain on the environment as possible. It is expected that employees contribute to achieving the best possible HSE level via their personal conduct. Everyone in the company must perform their duties in a safe, environmentally conscious, and effective manner, in line with applicable standards. All incidents or accidents in the workplace that can lead to damage to material assets or harm to persons must be reported immediately.
- e. Dynea shall respect the individual’s right to privacy and treat personal information responsibly and in accordance with applicable data protection legislation.
- f. Employees must adhere to company regulations regarding non-disclosure in regard to information obtained in the course of their work. Sensitive information must be treated

with due care and loyalty, even if this does not fall within the duty of non-disclosure.

- g. Employees shall not take on other paid work for others without consent from Dynea. If employees wish to become engaged in positions of trust in organisations or companies, it is a premise that these are not in competition with Dynea or in conflict with Dynea's interests.
- h. Dynea is an alcohol and drug-free workplace. This means that employees must not be under the influence of intoxicants when working for Dynea. Limited amounts of alcohol may however be served at special arrangements and during representation. In such case it is expected that employees show restraint and do not put the company or its business associates in a difficult or compromising position.

4. THE TRANSPARENCY ACT

- a. The Transparency Act shall contribute to reduce the risk for enterprises to induce or participate to breaches of human rights and decent working conditions. This is also valid for our suppliers. Dynea strives to follow the act through a due diligence of own activities and suppliers in accordance with the OECD guidelines.
- b. Dynea will, based on a risk evaluation, ask relevant suppliers to sign Dynea's Supplier Sustainability Code of Conduct.

5. OTHER

- a. Breaches of the ethical guidelines can lead to internal disciplinary sanctions, termination of employment, or in serious cases, criminal prosecution.
- b. If any employee should experience any breaches of the ethical guidelines or other unethical conduct, this should immediately be reported to an immediate superior or to his/her superior's immediate superior.

Lillestrøm, 28. March 2023